

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

\_\_\_\_\_  
WILLIAM P. CHERNICOFF

Plaintiff,

v.

\_\_\_\_\_  
NCO FINANCIAL SYSTEMS, INC.,  
LOVELACE HEALTH SYSTEMS,  
EQUIFAX INFORMATION SERVICES, LLC )  
BIRCHWOOD CREDIT SERVICES, INC., )  
TRANSUNION CORPORATION, and )  
EXPERIAN NATIONAL ASSISTANCE )  
CENTER, )  
Defendants. )  
\_\_\_\_\_

CA #04-10073NG

**ASSENTED-TO MOTION OF THE DEFENDANT, NCO FINANCIAL  
SYSTEMS, INC., TO ENLARGE TIME TO RESPOND TO THE  
COMPLAINT OF THE PLAINTIFF, WILLIAM P. CHERNICOFF**

The defendant, NCO Financial Systems, Inc. ("NCO"), respectfully moves, **with the assent of the plaintiff**, to enlarge the time by which NCO must answer, object or otherwise respond to the plaintiff's Complaint from March 14, 2004 up to and including April 13, 2004. Counsel for the plaintiff assented to this motion by telephone on March 9, 2004.

WHEREFORE, NCO requests that this Court allow this Assented-To Motion and enlarge the time to respond to the plaintiff's Complaint until April 13, 2004.

The Defendant,

NCO FINANCIAL SYSTEMS,  
INC.,

By its Attorneys,



James J. Duane, III, Esq.  
B.B.O. # 136500  
Eric M. Chodkowski, Esq.  
B.B.O. # 648629  
TAYLOR, DUANE, BARTON &  
GILMAN, LLP  
111 Devonshire Street  
Boston, MA 02109  
(617) 654-8200

The Plaintiff,

WILLIAM P. CHERNICOFF,

By his Attorney,



Andrew M. Fischer  
B.B.O. # 167040  
JASON AND FISCHER  
47 Winter Street  
Boston, MA 02108  
(617) 423-7904

**CERTIFICATE OF Rule 7.1 CONFERENCE AND OF SERVICE**

I, Eric M. Chodkowski, hereby certify that, prior to filing the within motion, I conferred with counsel for the plaintiff concerning said motion, who advised that they assent to said motion. I further certify that on this \_\_\_ day of March, 2004, I served a copy of the above motion by mailing same, postage prepaid to all counsel of record.



Eric M. Chodkowski